

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4 ATLANTA FEDERAL CENTER 61 FORSYTH STREET ATLANTA, GEORGIA 30303-8960

April 8, 2014

George F. Chandler Senior Advisor U.S. Department of Health and Human Services Centers for Disease Control and Prevention 1600 Clifton Road, N.E, Mailstop A-22 Atlanta, Georgia 30333

Subject:

EPA Comments on the Draft Environmental Impact Statement (DEIS)

for Centers for Disease Control and Prevention (CDC) Roybal Campus

2025 Master Plan. Atlanta, Georgia.

CEO #: 20140012 and ERP#: HHS-E80004-GA

Dear Mr. Chandler:

Pursuant to Section 309 of the Clean Air Act, and Section 102(2)(c) of the National Environmental Policy Act (NEPA), the U.S. Environmental Protection Agency (EPA) reviewed the subject document, participated in public meetings on January 17, 2012 and March 20, 2013 and submitted scoping comments on January 31, 2013. The purpose of this letter is to provide you with EPA's DEIS comments on the proposed Master Plan.

The proposed Master Plan builds upon a previously completed 2009 Master plan for the Campus. During the previous plan period, the Campus and the surrounding communities underwent substantial growth and development. The new Master Plan provides a roadmap for physical development and identifies potential opportunities and constraints for future growth and land-use.

The DEIS for the Master Plan for the Edward R. Roybal Campus covers a 10-year planning period from 2015 to 2025. The DEIS evaluates a No-Action Alternative and a Preferred Alternative that includes constructing a 350,000 to 450,000 square foot laboratory, renovating an existing building and expanding parking and upgrading infrastructure. EPA notes that the proposed facilities are all contained within the footprint of the existing Campus resulting in the minimization or avoidance of natural resources and environmentally sensitive areas.

The primary issue associated with implementing the preferred alternative is increased traffic at nearby intersections within the traffic Study Area. Other issues of importance are also discussed below.

Traffic: Many of the study area intersections already experience unacceptable levels of service due to congestion and traffic delay. According to the DEIS, Clifton Road at Old Briarcliff Road, Clifton Road at CDC Entrance, Clifton Road at Houston Mill Entrance, Clifton Road at Haywood Road, Clifton Road at Houston Mill Road and LaVista Road at Houston Mill Road would experience deteriorations to unacceptable levels with the proposal to add 1,200 additional parking spaces and additional employees to the Campus. In an effort to address traffic efficiency issues, the DEIS discusses potential low-cost, readily implementable mitigation measures at specific locations that include signalization improvement, lane restriping and widening (when sufficient right-of-way exists) as well as transportation demand management (TDM) strategies such as carpooling and policy initiatives such as paid campus parking. While the DEIS includes an extensive traffic analysis and identifies interim solutions for traffic impacts related to the project, it does not include any new or enhanced traffic mitigation measure commitments. Additional efforts can be made to enhance or expand existing TDM strategies or Campus Policy Initiatives and to coordinate with Georgia Department of Transportation and DeKalb County to assess the viability of the proposed low-cost measures. Outcomes of these efforts should be discussed in the Final Environmental Impact Statement (FEIS)

Based on our analysis of the proposed action, EPA rates this DEIS as LO i.e., EPA has "Lack of Objection" to the DEIS. The EPA's rating system can be found online at: http://www.epa.gov/oecaerth/nepa/comments/ratings.html. Efforts were made to address previous comments related to implementation of on-site best management practices for stormwater runoff that would minimize or prevent increased water volume and sediment loading to area waterbodies, air quality through the use of diesel emission reduction activities and dust suppression, noise, green building and sustainability practices. Ongoing traffic issues and congestion issues remain for nearby residents and commuters. Therefore, efforts should continue to be made to obtain commitments that could further offset traffic-related impacts.

Thank you for the opportunity to comment on this project. If you have any questions or require technical assistance, please contact Ntale Kajumba of my staff at (404) 562-9615.

Sincerely,

Heinz J. Mueller, Chief

NEPA Program Office

Office of Environmental Accountability